



west virginia department of environmental protection

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Jim Justice, Governor
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MEMORANDUM

To: Beverly D. McKeone, PE

From: Steven R. Pursley, PE *SAP*

Date: June 15, 2017

Subject: PD17-030

On June 2, 2017, Sal Chemical submitted a request for a permit determination to the WVDAQ. Page 2 of their permit determination form (PDF) shows hourly VOC emissions of 376 pounds per hour and HAP emissions of 720 pounds per hour. Based on these numbers alone, it is clear that the facility would exceed the daily PTE trigger of 144 pounds per day found in 45CSR§13-2.24b and thus require a permit. It should be noted that I am highly skeptical of these numbers. I think they likely represent throughput and not emissions. However, there is not sufficient information in the PDF to verify that this is true and certainly not enough information to replicate the calculations. This may be somewhat moot considering that given the throughputs I do think it's likely that the correct PTE would still trigger the need for a permit. Given all the above, their "permit needed" letter will include the suggestion to contact Gene Coccari of DAQs small business assistance program to help them better quantify their emissions.